

REMARKS

Claims 1-13 are all the claims pending in the application. By this Amendment, new claims 12 and 13 are added. Claims 1-11 are rejected under 35 U.S.C. § 112, first paragraph as failing to comply with the written description requirement. Applicant adds the new claims 12-13 and submits the arguments below in traversal.

Rejection of Claims 1-11 under § 112, first paragraph

Applicant submits that claims 1-22 comply with § 112, first paragraph. Applicant submits that the specification at page 3, line 12, page 4, line 14, page 5, line 11, and page 13, line 9 provide support.

Rejection of Claims 1, 4-5 and 9-11 under § 103(a) over Nakagawa, Katsuyama, and Watanabe

Applicant submits that claim 1 is patentable because the combination of Nakagawa, Katsuyama and Watanabe fails to teach or suggest (c) increasing a threshold value used for denoising if a pattern quantizing value is retained, and denoising the decomposed data, in combination with other elements of the claim. Although the Examiner cites various sections of Watanabe as allegedly disclosing such features of claim 1, Applicant submits that none of these sections disclose “increasing a threshold value used for denoising” in connection with “if a pattern quantizing value is retained.”

First, even assuming arguendo, that the claim recitation, “if a pattern quantizing value is retained,” is broadly interpreted to merely mean “if a pattern quantizing value is obtained,” as the Examiner suggests on page 5 of the Office Action, Watanabe still fails to disclose increasing any sort of a threshold value used for denoising in connection with the obtaining of a pattern

quantization value. Assuming for the sake of argument, that Nakagawa or Katsuyama discloses or suggests obtaining a pattern quantizing value, there is nothing in Watanabe which suggests that the threshold voltage level in Watanabe is increased if a pattern quantizing value is obtained. Rather, Watanabe discloses increasing or decreasing the threshold voltage level depending on whether there is poor contrast or high contrast. In other words, even if the combination of references discloses “if a pattern quantizing value is obtained,” Watanabe still does not disclose increasing a threshold value used for denoising as a result of obtaining of the pattern quantizing value.

Second, the “threshold voltage value” of Watanabe is not disclosed as being a threshold value associated with any denoising. Rather, the threshold voltage value is used with a photoelectric conversion section, not with any sort of denoising process.

For at least the above reasons, Applicant submits that claim 1 is patentable.

Applicant argues that claims 4 and 11, which depend from or ultimately depend from claim 1, are patentable for at least the reasons submitted for claim 1.

Claims 5, 9 and 10 recite features similar to those discussed above and thus, Applicant submits that claims 5, 9 and 10 are patentable for reasons similar to those submitted for claim 1.

Rejection of Claims 2 and 6 under § 103(a) over Nakagawa, Katsuyama, Watanabe, and Acharya

Applicant submits that claims 2 and 6 are patentable for at least the reasons submitted for their respective base claims 1 and 5.

Lastly, Applicant submits that claims 7 and 8, which ultimately depend from claim 5, are patentable for at least the reasons similar to those submitted for claim 3 in the June 26, 2006

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Amendment. Given that the Examiner has found claim 3 to be allowable, Applicant submits that claims 7 and 8 should be allowable as well.

New claims 12 and 13 are believed to be patentable for at least the reasons submitted for their respective base claims.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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